

REMARKS

Claims 1, 3-13, 16, 19, 21-31, 34-36, 38-39, 41-48, and 51 are amended.

Claims 1-52 remain pending.

On December 14, 2006 the Examiners Knight and Brown extended the courtesy of a telephone interview to the attorney of record below and one of the Applicants, Rob Jaspers. The Applicants thank the Examiners for their constructive suggestions as to certain of the amendments to the claims. A summary of the issues addressed in the interview are provided below.

Claims 1-52 were rejected under 35 U.S.C. §101 as allegedly reciting non-statutory subject matter. Claims 1-52 were also rejected under 35 U.S.C. §112 as allegedly failing to comply with the enablement requirement. Both of these rejections are traversed, and were discussed during the interview.

The Examiners stated during the interview that the claims did not recite any “real world” limitations and thus were entirely “abstract” and “algorithms.” Applicants stated that the claims as filed do relate to the real world in at least that they recite the use of a predictive model (implemented in computer system) to predict outcomes related to real world events. Applicants further note that the claims do satisfy the “concrete, useful, tangible” test set forth in State Street Bank. First, the claims recite the selection of transformation rules, based on their ability to improve the accuracy of the predictive mode. The transformation rules are concrete in that they perform specific operations on unstructured content. Second, the selection of certain rules is useful because it improves the accuracy of the predictive model, and improving the performance of a prediction of a real world event is certainly a useful result. Finally, the result is tangible

because the operations are conducted within a computer and the selection of certain rules, as well as the improved predictive model, are stored in a computer memory. Accordingly, it is respectfully submitted that claims 1-18 as originally presented were statutory process claims. Claim 19-35 are “system” type apparatus claims that are on their fall within the statutory “machine” class, and are not “software per se.” Similarly, claims 36-52 are “computer program product” claims, and not a “program listing” as alleged. Rather, these claims describe the “acts” undertaken by a computer which permit the computer program’s functionality to be realized by making use of the program product, and thus are statutory. See MPEP 2106.01.

Nonetheless, the independent claims and certain dependent claims have been amended in view of the Examiner’s suggestions to satisfy the Examiner’s concerns pertaining to need for “real world” limitations in the claims; the dependent claims have been amended to be consistent with their respective independent claims. Claim 1 is illustrative, and now is directed specifically to the application of selecting transformation rules for transforming unstructured text content in *customer accounts*. The unstructured text content is *derived from an interaction with the customer*, and hence represents some real world interaction of the customer and the entity (e.g., business) that has the customer’s account. The accounts include *structured content records* that include *financial and personal information* of a customer, again showing that this information is representative of “real world” attributes of customers. In claim 1, the customer accounts include *an actual outcome of an event related to the customer*, thereby further indicating that the operation of the method pertains to “real world” events related to the customer. The claimed *predictive model* predicts *outcomes* of such events, thus providing a prediction of a “real world” event, as it would be represented in the customer account. Thus, the method of amended claim 1 has the useful, concrete, and tangible result of improving the accuracy of predictions being made

about the real world customers, using, in part, data derived from real world interactions of the customer (as represented by the unstructured text content in their respective accounts).

Independent claims 18, 19 and 36 have been similarly amended.

During the interview, it was acknowledged by the Examiners that amendment of the claims to overcome the rejection under §101 would suffice as well to overcome the rejection under §112.

Because the amendments to the claims were made in response to the Examiner's suggestions, it is respectfully requested that the next Official Action be non-final, as stated in the third paragraph of MPEP 706.07(a).

Accordingly, it is requested that the rejections of claims 1-52 under §101 and §112 be withdrawn.

Claims 1, 18, 19, and 36 were rejected under 35 U.S.C. §103(a) as being unpatentable over Azari in view of various combinations of Brill, Oracle, and Dittrich. These rejections are traversed. It is noted that none of the dependent claims (2-17, 20-35, 37-52) were rejected under §103(a).

As stated above, claims 1, 18, 19, and 36 have been amended to overcome the rejection under §101. Claim 1 is illustrative and now recites:

1. A method for selecting transformation rules for application to unstructured text content in customer accounts, comprising:

storing a plurality of customer accounts, each customer account comprising:

**a structure content record of financial and personal information
associated with a customer;**

unstructured text content derived from an interaction with the customer; and

an actual outcome of an event related to the customer;

providing a set of source tokens from the unstructured text content of the customer accounts, each source token associated with at least one of the structured content records;

applying candidate transformation rules to a set of source tokens to selectively produce tokens in response to the transformation rules;

determining **for each candidate transformation rule a statistical measure of accuracy of a predictive model for predicting outcomes of events related to the customers based on the actual outcomes of events in the customer accounts** associated with the produced tokens; and

selecting transformation rules that improve the measure of accuracy of the predictive model.

(emphasis added).

Amended claim 1 is now directed to improving the accuracy of *a predictive model for predicting outcomes of events related to the customers based on the actual outcomes of events in the customer accounts*. The customer accounts include *structure content record of financial and personal information associated with a customer, unstructured text content derived from an interaction with the customer, and an actual outcome of an event related to the customer*.

Azari does not disclose or suggest anything related to these claim limitations. Azari is a “question-answering system” based on the “AskMSR” system, which generates “answers to freely posed questions, based on information drawn from the Web” (Abstract). The “questions” are free text queries such as “Who killed Abraham Lincoln”. First, Azari’s purpose is not to select transformation rules to improve the accuracy of a predictive model that predicts the

outcomes of events related to customers, but instead to “limit[ing] the number of queries issued by AskMSR” (Section 5.1), and thus reduce the number of different ways a query, such as “Who killed Abraham Lincoln” is presented to the system. There is simply no mention, no hint or suggestion *predicting outcomes of events related to the customers* as claimed. Further, a particular document that answers a query like “Who killed Abraham Lincoln” is a web page, and thus is not an *outcome of event related to a customer*.

Second, because Azari only deals with web documents, not with customer accounts, it follows that there is no disclosure or suggestion of identifying transformation rules that transform *unstructured text content derived from an interaction with the customer*.

Finally, none of the secondary references, Brill, Oracle, or Dittrich, remedy Azari’s deficiencies.

Accordingly, it is requested that the rejections of claim 1, 18, 19 and 26 under §103(a) be withdrawn.

The Examiner is invited to contact the undersigned attorney if he deems it would be helpful to advance the prosecution of this application.

Respectfully submitted,
MATTHEW S. JACOBSEN ET AL.

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By: /Robert R. Sachs/
Robert R. Sachs, Reg. No. 42,120
Fenwick & West LLP
Silicon Valley Center
801 California Street
Mountain View, CA 94041
Tel.: (415) 875-2410
Fax: (415) 281-1350